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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,

No. 6:11-cr-60097-AA-1

Plaintiff,

v.

DEFENDANT'S REPORT REGARDING
STIPULATIONS FOR HEARING ON
MOTION TO SUPPRESS

CODY CRAWFORD,

Defendant

On September 25, 2014, the court directed the parties to confer and report to the court regarding stipulations pertinent to the hearing on the Defendant's Motion to Suppress Statements and Conduct, scheduled for hearing October 7, 2014.

The parties report the following stipulations:

1. The government has submitted as its Exhibits 1, 2, and 3 certain audio and video recordings of events relevant to the motion. The defendant has submitted, or will submit, Defense Exhibits A-1, A-3, B-2, B-4, B-6, B-8, B-10, B-12, B-14, B-16, B-18, F-2, F-4, F-6, and X-2, which are also audio or video recordings of events pertinent to the motion, some of which are

portions of the recordings submitted by the government. All of these Exhibits may be admitted without further identification. To the extent any portion of these recordings may not be played in court during the motion hearing, the court may nonetheless view and/or listen to such evidence and consider it in ruling on the motion.

2. Defense Exhibits A, A-1, A-3, B, B-1, B-3, B-5, B-7, B-9, B-11, B-13, B-15, B-17, F, F-1, F-3, and F-5 are transcripts prepared by the defense regarding recordings referenced in stipulation 1, above. The court may admit and consider these Exhibits as aids to understanding the recordings; however, the recordings shall be considered the actual evidence of the events, and the court's, that is, the factfinder's, interpretation of sounds or visual events shall control over the transcripts.

3. Defense Exhibits D, E, G, H, I, K, L, M, N, the entire O-series, the P-series, Q, R, the S-series, T, U-1 and U-2, W, X-1, and the Y-series, are expert reports, law enforcement reports, medical records, search warrant applications or executions, court documents, or other documents, or excerpts. These Exhibits may be admitted without further authentication. To the extent any of these Exhibits contain statements or observations of any person, the parties stipulate that such person, if called to testify, would testify in accord with the statements or observations stated therein, and the court may consider such evidence without the need for the person to testify.

4. The government has provided an additional Exhibit in the nature of a Facebook posting. The parties stipulate that this Exhibit may be admitted.

Bud Fitzgerald, Assistant United States Attorney, has reviewed this document and authorized its filing.

THIS the 3d day of October, 2014.

/s/ Bryan E. Lessley
Bryan E. Lessley
Assistant Federal Public Defender